

CORPORATION PROGRAMS FEDERAL CDMa subsidiary of Camp Dresser & McKee Inc.

September 28, 1992

Ms. Elizabeth Van Rabenswaay Regional Project Officer U.S. Environmental Protection Agency 26 Federal Plaza New York, New York 10278

PROJECT:

DOCUMENT CONTROL NO.:

SUBJECT:

TES V, EPA CONTRACT NO.: 68-W9-0002

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Letter Report Environmental Priorities Initiative

Preliminary Assessment

Diamond Aerosol

Glen Gardner, New Jersey

EPA ID. Number: NJD04964638

Document Control No: TES5-R02024-LR-CQKD

Dear Ms. Van Rabenswaay:

Please find enclosed the letter report entitled, "Environmental Priority Initiative Preliminary Assessment for Diamond Aerosol, Glen Gardner, New Jersey", as partial fulfillment of the reporting requirements for this work assignment.

If you have any comments regarding this draft submittal, please contact Jeanne Litwin at (212) 393-9634 within two weeks from the date of this letter.

Sincerely,

CDM FEDERAL PROGRAMS CORPORATION

Regional Manage

Enclosure

Tim Gordon, EPA Work Assignment Manager, RCRA Region II cc:

Nancy Toy, EPA Contracting Officer (letter only)

Jeanne Litwin, CDM FEDERAL PROGRAMS CORPORATION Pamela Philip, CDM FEDERAL PROGRAMS CORPORATION

Document Control, CDM FEDERAL PROGRAMS CORPORATION (2 Copies)

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LETTER REPORT

ENVIRONMENTAL PRIORITY INITIATIVE PRELIMINARY ASSESSMENT DIAMOND AEROSOL GLEN GARDNER, NEW JERSEY

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY Office of Waste Programs Enforcement Washington, D.C. 20460

EPA Work Assignment No.

EPA Region

Site No.
Contract No.

CDM FEDERAL PROGRAMS

CORPORATION Document No.

Prepared By

Work Assignment Project Manager

Telephone Number

EPA Work Assignment Manager

Telephone Number Date Prepared : R02024

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: TES5-R02024-LR-CQKD

: CDM FEDERAL PROGRAMS CORPORATION

: Jeanne Litwin

: (212) 393-9634

: Tim Gordon

: (212) 264-9538

: September 28, 1992



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Mr. Tim Gordon U.S. Environmental Protection Agency 26 Federal Plaza New York, NY 10278

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Preliminary Assessment Diamond Aerosol

Glen Gardner, New Jersey

EPA ID. Number: NJD04964638

ND 049 644 438

Dear Mr. Gordon:

CDM FEDERAL PROGRAMS CORPORATION (CDM Federal) was tasked to perform an Environmental Priorities Initiative (EPI) Preliminary Assessment (PA) for the Diamond Aerosol Corporation (Diamond Aerosol), Glen Gardner, New Jersey. CDM Federal was unable to gain access to the facility. It was later determined that the facility is no longer operating at its Glen Gardner address. This letter report summarizes all available site information.

Site History

Diamond Aerosol was located in a rural area of Glen Gardner, Hunterdon County, New Jersey. In 1956, Electro Organic began operating on the property. In the early 1960s, the company changed its name to Diamond Aerosol. The company initially was involved in the formulation and blending of chemical products. Diamond Aerosol produced nail polish remover, fragrances cosmetics, and tear gas during its later years of operation. Pyruvic acid, benzoic acid, 1,1,1-trichloroethane, methylene chloride, and cyanide were among the chemicals used in the production processes. In 1986, Diamond Aerosol changed its name to Diamond East before the company relocated to 30 miles west to Pennsylvania. Presently, the owner of the property, George Diamond, rents the warehouse to two companies, Selvac Company and Washington Labs Incorporated. Washington Labs, who purchased the tear gas division from Diamond East in 1987, manufactured tear gas and shredded and reclaimed the inert ingredients of the aerosol cans. Selvac Company uses a onsite warehouse for storage.

There have been numerous spills and drum burials documented onsite. The types of contaminants include various cleaning solutions, caulking compounds and tear gas canisters. Sampling is being conducted and monitored by the New Jersey Department of Environmental Protection and Energy (NJDEPE), Bureau of Environmental Evaluation. Cleanup and Responsibility Assessment (BEECRA) under the New Jersey Environmental Cleanup Responsibility Act (ECRA) Case Number 85102. Grace Jacobs, NJDEPE, is the case manager.

Waste Disposal

Prior to 1968, the company, which was then operating as Electro Organic Inc., was manufacturing organic chemicals. Solid and liquid waste was disposed of in a 50 feet x 100 feet landfill located in the southwestern corner of the facility. Waste solvents including acetone, methyl ethyl ketone, methylene chloride, heptene toluene, and

xylene, and spent acids, were disposed in an unlined lagoon located in the same area. The company waste stream changed over the years as its production line varied. The facility used the landfill for the disposal of both solid and liquid waste until 1972. In 1983, the landfill area was excavated.

In the 1960's a burning pit, located in the northwest corner of the site, was used to burn aerosol cans and other waste.

Diamond Aerosol, up until 1980, routinely discharged its liquid waste material and non-contact cooling water into the floor drains of its production building. These drains discharged into adjacent wooded areas and ultimately into a nearby creek. This discharge was regulated by New Jersey Pollutant Discharge Elimination System (NJPDES) permit (No. 0034894). In 1980, a complaint was filed to the NJDEPE. Diamond Aerosol subsequently ceased this practice.

Environmental Surrounding

The Diamond Aerosol site is located in the Highlands Physiographic Province of New Jersey. There are three series of soil located in this area which rest on precambrian rock. The undifferentiated precambrian crystalline rocks which underlie the site are essentially nonpermeable; however, fractures in the rocks control groundwater flow. Where the fractures, joints and faults are interconnected, a water table condition will exist; however, when fractures are partially or wholly isolated, each fracture or fracture system will exhibit its own water level. The fracture pattern of the precambrian gneiss is irregular and unknown for any specific site. Therefore, the direction and velocity of groundwater flow is not predictable of easily accessible. The most abundant open fractures and weathered zones usually occur at depth of less than 130 feet below surfaces.

Surface drainage generally flows across the site from the northwest to the southeast. The northwest part of the site has an average slope of 11% and the southeast portion of the site slopes at an average of 5 to 6%. The extreme eastern edge of the property borders a small tributary which flows to Spruce Run Creek and eventually feeds into Spruce Run Reservoir, approximately 8 miles from the site.

Contamination

Extensive soil sampling completed by the NJDEPE has led to the identification of contaminated soil at Diamond Aerosol. Contaminants such as fuel oil, isopentane, cosmetics and tear gas were found to be present in many of the areas. The sources of possible contamination are as follows: stockpiles of soil form the excavated lagoon and landfill east of the landfill site; isoprene spilled and caught fire northwest corner of the warehouse building; burning pit in northwest corner of property, used for burning debris and aerosol cans; subsurface discharge pipe west of the Warehouse Production Building; stained soil from the compressor discharge located at the southwest corner of warehouse and production building; spillage of heating fuel oil on the ground west of the wooded; the empty fire pond located east of the facility; and the septic system located south of the parking area.

There are 10 monitoring wells on-site. The wells range from 19 to 30 feet deep depending on the fractures in the precambrian crystalline rocks and decomposed or fractured gneiss. MW-1 through MW-7 indicated elevated levels of volatile organics between November 1983 and March 1984. MW-3 showed base/neutral concentrations above the NJDEPE guideline concentration of 50 parts per billion (ppb). Monitoring well MW-3 was removed when soil from an old lagoon, where MW-3 was located, was excavated.

Five private wells, in the area of the site, averaging 150 feet deep were sampled. Background levels of methylene chloride and low levels of Freon 113 and/or 1,1,1-trichloroethane were detected. There were five industrial wells located three miles southwest of the site ranging in depth from 104 to 305 feet deep. Diamond Aerosol does not have a permit to discharge into groundwater and no violations were issued to the company.

Enforcement Actions

In May 1980, Diamond Aerosol was investigated as a result of complaints that the company was dumping into Spruce Run Creek. The NJDEPE followed up the investigation and gave recommendations.

The Diamond Aerosol Company was issued an Administrative Consent Order by NJDEPE, Division of Hazardous Waste Management, in the early part of summer 1983, to cease unpermitted discharges. The company agreed to execute provisions by October 30, 1983. The document does not show information whether or not provisions were executed.

In November 1986, Diamond Aerosol was issued an Administrative Consent Order by NJDEPE, Division of Hazardous Waste Management, for failure to arrange, store and label containerized waste, failure to develop a program of classroom instruction for proper Hazardous Waste Management and for failure to provide natural or artificial barriers which completely surrounded the active portion of the facility.

Investigations and Reports

- New Jersey Environmental Cleanup Responsibility Act (ECRA) Case Number 85102, Grace Jacobs Case Manager.
- o Site Inspection Report, Robert Ekholm, HSME IV, New Jersey Department Environmental Protection and Energy, Bureau of Planning and Assessment, October 20 1989.

If you have any questions or comments regarding this facility, please feel free to call me at (212) 393-9634.

Sincerely,

CDM FEDERAL PROGRAMS CORPORATION

Jeanne Litwin

Work Assignment Manager

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SPECIFIC QUESTIONS	YES	MAR	K'X' FORM	SPECIFIC QUESTIONS	YES	MAR	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		Х	ATTACHED	B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X	17	16	D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)	19	20 X 26	21
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X 28	23	X 30	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)	31	X 32	33
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas pro- duction, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		x	
 Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the in- structions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an 		35 X	36	J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment	37	38 X	39
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RURAL RT 1	1 1			45			
B. CITY OR TOWN G LEN GARDNER	1 1 • •	1		C.STATE D. ZIP CODE			
VI. FACILITY LOCATION A. STREET, ROUTE NO. OR OTHER S							
B. COUNTY NAME			A D S				
HUNTERDON	TT	10		70			
C. CITY OR TOWN G G L E N G A R D N E R				D.STATE E. ZIP CODE F. COUNTY CODE (if known)			
15 16 EPA Form 3510-1 (6-80)				40 41 42 47 - 51 52 - 54 CONT	NUE	ON F	REVERSE

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c. STATUS OF OPERATOR (Enter the a	ppropriate letter into the a	answer box; if "Othe	er", specify.)	D. PHONE	(area code & no.)
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A. NPDES (Discharges to Surface Water)	D. PSD (Air Emis	ssions from Proposed			
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tach to this application a topographic recouling of the facility, the location of atment, storage, or disposal facilities, ter bodies in the map area. See instructional NATURE OF BUSINESS (provide a brief de	f each of its existing ar and each well where it ions for precise requirer	nd proposed intal	ke and discharge	structures each of	its hazardous waste
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certify under penalty of law that I have tachments and that, based on my inquipolication, I believe that the information (se information, including the possibility	uiry of those persons in is true, accurate and	immediately resp	ansible for abta	ining the informati	ion contained in th
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MMENTS FOR OFFICIAL USE ONLY	107	.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,			TT/ T3/ OU
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Form 3510-1 (6-80) REVERSE					55

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	(continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

- EPA HAZARDOUS WASTE NUMBER Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis, For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows

- 1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.

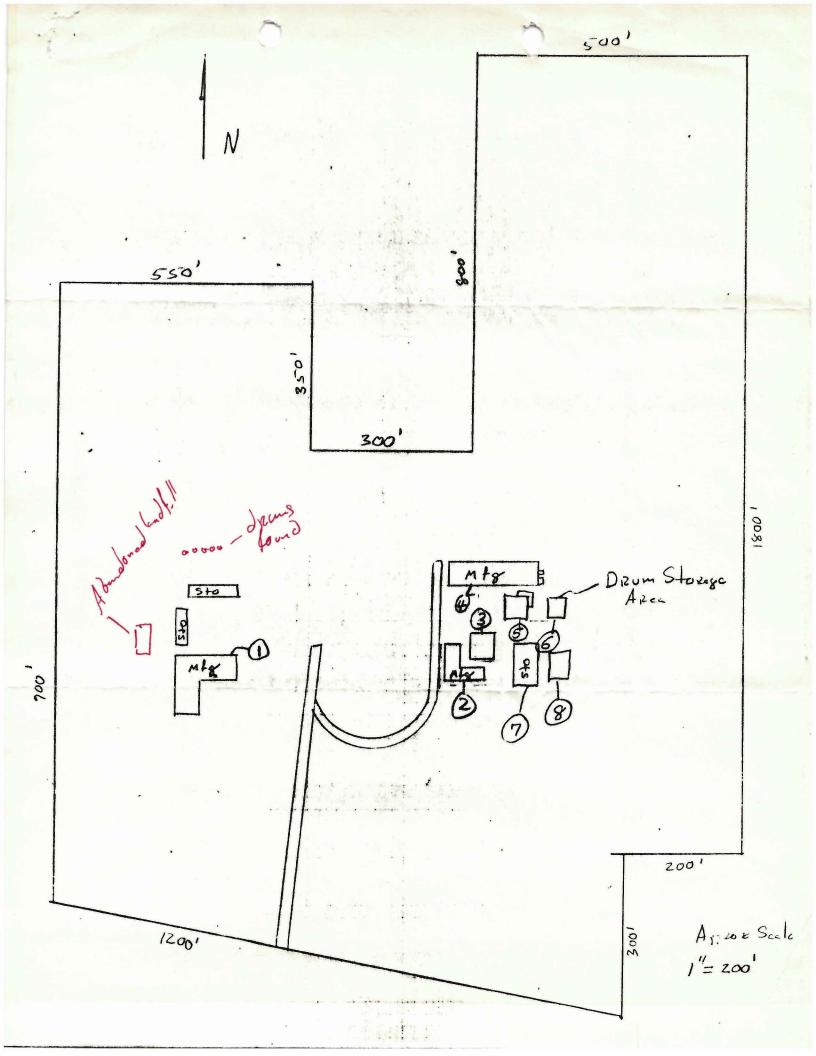
 In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter
- 'included with above" and make no other entries on that line,
- Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

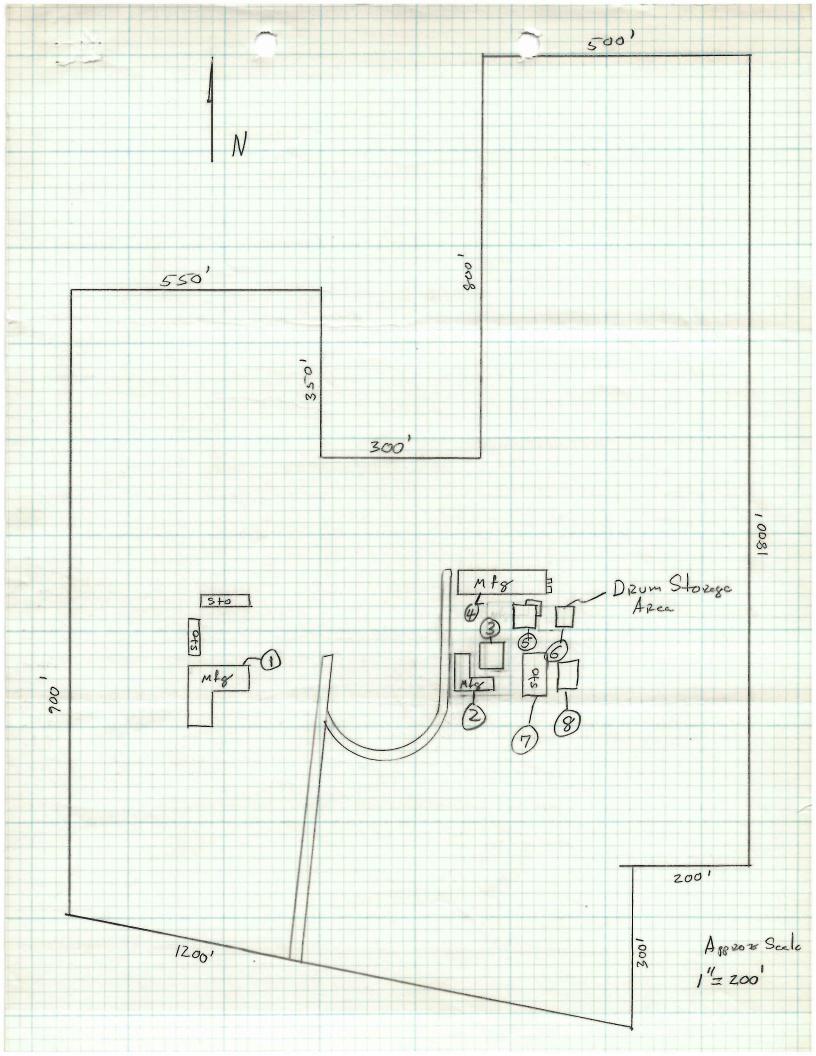
EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

1.1		A.						UNIT		D. PROCESSES							D. PROCESSES			
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X-2	L	0	0	0	2	400		P	T	0	3	3 1	,	8	0					
X-3	L	0	0	0	1	100		P	T	0	3	3 1	,	8	0	3000		No. of the last		
X-4	L)	0	0	2					1			I							included with above

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IV. DESCRIPTION OF HAZARDOUS WASTES	ntinued)	CHICAGO AND ST	
E. USE THIS SPACE TO LIST ADDITIONAL PRO	CESS CODES FROM ITEM	D(1) ON PAGE 3.	
		- 1	
		/0	
EPA I.D. NO. (enter from page 1)	F6: 55	F6: 56	
N J D O 4 9 6 4 4 4 3 8	r6.33	16-56	
13 14 15			
V. FACILITY DRAWING All existing facilities must include in the space provided on	page 5 a scale drawing of the fac	cility (see instructions for more detail.	
VIPHOTOGRAPHS	THE REPUBLICAN	NO SELECTION OF THE PARTY OF	
All existing facilities must include photographs (aer.	ial or ground-level) that cle	arly delineate all existing structur	res; existing storage,
treatment and disposal areas; and sites of future sto	rage, treatment or disposal a	reas (see instructions for more de	etail).
VII. FACILITY GEOGRAPHIC LOCATION LATITUDE (degrees, minutes, & seconds)			SECULO SIDE OF OUT OF SECULO
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V.III. FACILITY OWNER A. If the facility owner is also the facility operator as skip to Section IX below. B. If the facility owner is not the facility operator as I. NAME OF FACILITY OWNER	listed in Section VIII on Form 1	, "General Information", place an "X	1 0 0
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V.III. FACILITY OWNER A. If the facility owner is also the facility operator as skip to Section IX below. B. If the facility owner is not the facility operator as I. NAME OF FACES G. E. 15 16	listed in Section VIII on Form 1 listed in Section VIII on Form 1 LITY'S LEGAL OWNER	, "General Information", place an "X , complete the following items:	" in the box to the left and PHONE NO. (area code & no.)
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V.III. FACILITY OWNER V.III. FACILITY OWNER A. If the facility owner is also the facility operator as skip to Section IX below. B. If the facility owner is not the facility operator as I . NAME OF FACILITY OWNER OF FACILITY OWNER CERTIFICATION I certify under penalty of law that I have personally	listed in Section VIII on Form 1 listed in Section VIII on Form 1 LITY'S LEGAL OWNER 4. CITY C G 48 115 16	, "General Information", place an "X , complete the following items: 2 Y OR TOWN 5. ST. 40 41 42 with the information submitted in	" in the box to the left and PHONE NO. (area code & no.) 50 - 61 92 - 65 6. ZIP CODE
V.III. FACILITY OWNER V.III. FACILITY OWNER A. If the facility owner is also the facility operator as skip to Section IX below. B. If the facility owner is not the facility operator as I. NAME OF FACILITY. S. STREET OR P.O. BOX C. F. IS 156 IX. OWNER CERTIFICATION I certify under penalty of law that I have personally documents, and that based on my inquiry of those is submitted information is true, accurate, and complete	listed in Section VIII on Form 1 listed in Section VIII on Form 1 LITY'S LEGAL OWNER 4. CIT'S G 48 115 16	, "General Information", place an "X , complete the following items: 2 Y OR TOWN 5. ST. 40 41 42 with the information submitted in onsible for obtaining the informa	" in the box to the left and " in the box to the left and PHONE NO. (area code & no.) 59 59 61 92 63 6. ZIP CODE of this and all attached tion, I believe that the
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IV. DESCRIPTION OF HAZARDOUS WASTES	ntinued)					-30			
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V. FACILITY DRAWING	103/2017		147 E 148			Fig.		5 1 5 2	10
All existing facilities must include in the space provided or	n page 5 a scale drawing o	f the facility (see instructions	for more o	letail).					
VI-PHOTOGRAPHS									
All existing facilities must include photographs (ae treatment and disposal areas; and sites of future stope	<i>rial or ground—level)</i> to prage, treatment or dis	hat clearly delineate all ex posal areas <i>(see instruction</i>	ns for mo	icture re deta	s; exis	ting si	torage		
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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REGION II 26 FEDERAL PLAZA NEW YORK, NEW YORK 10278

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Mr. George Tyler
Assistant Commissioner for
Environmental Management and Control
New Jersey Department of
Environmental Protection
Labor and Industry Building, Room 805
P.O. Box CN 402
Trenton, New Jersey 08625

Dear Mr. Tyler:

On January 31, 1983, the Environmental Protection Agency (EPA) Region II sent 302 warning letters (sample copies enclosed) to owners and operators of hazardous waste facilities which were not in compliance with EPA's financial responsibility regulations. These regulations became effective in July 1982 and required facilities to demonstrate that funds are available for:

- meeting their obligations under the Resource Conservation and Recovery Act (RCRA) for proper closure and post-closure care of their facilities (i.e., "financial assurance"); and
- compensating others for bodily injury or property damage caused by accidents arising from operations of the facilities (i.e., "liability insurance").

The following is to summarize industry's compliance to date (or lack thereof) with the Federal financial responsibility regulations. See the enclosed computer printout for a listing of the facilities in compliance with the Federal regulations. Also enclosed is a listing of the facilities within each non-compliance category.

- Number of facilities which have submitted all required documents (including those facilities that have utilized the financial test and corporate guarantee methods of compliance) 279
- Number of facilities which demonstrated financial assurance only

- Number of facilities which demonstrated liability insurance only
- 28

56

Number of "non-submitters" (excluding facilities which either closed or requested to be declassified as hazardous waste facilities)

The above numbers indicate that 94 facilities are in violation of the Federal and State financial responsibility requirements. Our concern is whether the State or EPA should proceed with enforcement follow-up activities for these 94 facilities. State's financial regulations, which have been in effect since October 1981, are even more stringent than the Federal regulations in that they do not provide facilities with the option of using the corporate guarantee or the financial test for demonstrating proof of financial assurance and liability insurance. Two hundred and thirty facilities have utilized these alternative methods (see the enclosed computer printout for a listing of facilities which employed these methods). Now that New Jersey has received Phase I interim authorization, the State is responsible for enforcing financial regulations in lieu of EPA. However, the Phase I Memorandum of Agreement (MOA) does provide that EPA can initiate enforcement actions in cases where the State does not initiate timely and appropriate enforcement actions against violators. Regardless of which Agency takes the lead, enforcement actions must be based on the State's financial regulations (see enclosed EPA guidance on enforcement actions in authorized States)

Please notify me within the next two weeks as to the State's plan of action (including time frames) for conducting follow-up enforcement activities for the 94 facilities identified in the enclosure. (Of course, some of these facilities may have already provided the State with financial documentation pursuant to State regulations and would therefore not be considered enforcement candidates by New Jersey.) My staff and I are ready to provide assistance to New Jersey in implementing this high priority portion of the State's Phase I hazardous waste program. Alternatively, if the State chooses not to take the enforcement lead at this time, EPA is ready to proceed with initiating said enforcement actions and will keep New Jersey informed of its activities.

Your cooperation on this matter is appreciated.

Sincerely yours,

Conrad Simon

Director

Air & Waste Management Division

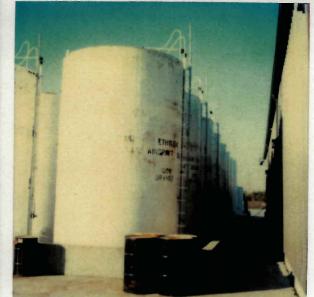
Enclosures

cc: Michael DeBonis

Asst. Director for Planning

and Resource Recovery, NJDEP (w/o encl.)





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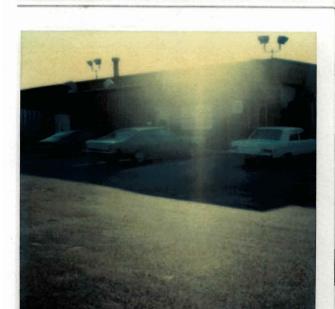








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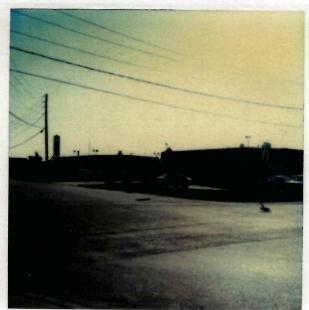
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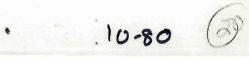




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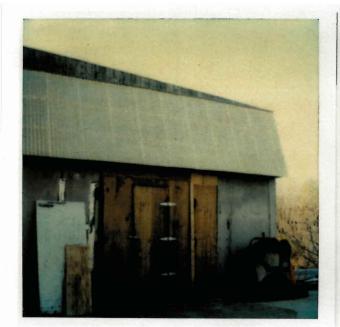
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